

800 Response Information Services LLC

February 21, 2019

Via electronic filing

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Suite TW-A325
Washington, D.C. 20554

Re: EB Docket No. 06-36
Annual CPNI Certification for Year 2018

Dear Ms. Dortch:

Enclosed for filing pursuant to 47 CFR 64.2009(e), please find 800 Response Information Service LLC's annual CPNI certification and statement for the calendar year 2018.

Please feel free to contact me if you have any questions.

Sincerely,



Linda Young
Vice President, Operations

Enclosures

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018

Date filed: February 21, 2019

Name of company covered by this certification: 800 Response Information Services LLC

Form 499 Filer ID: 825473

Name of signatory: Linda Young

Title of signatory: Vice President of Operations

I, Linda Young, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may be subject it to enforcement action.

Signed



Signature of an officer, as agent of the company

800 Response Information Services LLC

CPNI Compliance Statement

800 Response Information Services LLC (800 Response) has the following safeguards in place to ensure that it is in compliance with Part 64 of Title 47 of the Code of Federal Regulations, Subpart U – Customer Proprietary Network Information (CPNI), § 64.2001 et seq.

Compliance Officer

800 Response has appointed a CPNI Compliance Officer. The Officer is responsible for ensuring that the Company is in compliance with all CPNI rules. The Officer also communicates with the company's attorney regarding CPNI compliance matters. The Compliance Officer and/or the company's attorney is point of contact for anyone with questions about CPNI.

Employee Training

The Compliance Officer arranges for training of all employees. The training includes but is not limited to, the general safeguarding requirements for CPNI, when employees are and are not authorized to use CPNI, and the authentication methods 800 Response uses when disclosing CPNI to its customers. The detail of the training differs on whether the employee has access to CPNI.

Employees are trained that if they ever have any questions about the use of CPNI, or if they are aware of CPNI being used improperly by anyone, they should contact the Compliance Officer or the company's attorney immediately.

Disciplinary Process

The Company has established a disciplinary process for improper use of CPNI. Any unauthorized use, sale or other disclosure of CPNI by any employee would subject the employee to disciplinary action, up to and including dismissal.

Customer Authentication

800 Response does not disclose any CPNI to a customer based upon customer-initiated contact until the customer has been authenticated as follows:

In-Office Visit – Customers have not historically visited 800 Response's office. Should such a visit occur, the customer would be required to provide a valid photo ID matching the customer's account information

Customer-Initiated Call – All of 800 Response's customers are business customers. Accordingly, 800 Response uses the business customer exception in dealing with

customer-initiated calls. 800 Response's service contracts protect the customer's CPNI by, among other things, designating and identifying specific individuals within the customer's organization who may act on the customer's behalf. Further, 800 Response's customers have dedicated account representatives whose interactions with the customer may involve CPNI. Otherwise, 800 Response will only disclose CPNI by sending it to the customer's address of record, or by calling the customer at the telephone number of record. If the customer is able to provide CPNI to 800 Response during a customer-initiated call without 800 Response's assistance, then 800 Response may discuss such CPNI as provided by the customer.

On-Line Access – All on-line customer access to their CPNI is password protected.

Marketing Campaigns

800 Response and its affiliates do not use customer CPNI to market its services.

If 800 Response should decide to utilize CPNI in marketing campaigns, such campaigns would be limited to the marketing of enhanced service offerings to its inter-exchange services (provided that the customer already subscribes to the inter-exchange services). Should 800 Response engage in such marketing, supervisory approval would be required for all such outbound marketing plans and records of any such marketing campaigns that utilize customers' CPNI would be maintained for a minimum of one year.

Customer Request for Approval to Use CPNI

800 Response does not sell, rent or otherwise disclose customers' CPNI to other entities. Nor does 800 Response or its affiliates use CPNI for any purpose other than to provide contracted for services to its customers. Accordingly, 800 Response does not seek either opt-in or opt-out approval to use, sell, rent or otherwise disclose a customer's CPNI.

Disclosure of CPNI to 800 Response's Affiliates

If a customer subscribes to and signs a service contract with both 800 Response and 800 Response's affiliate for inter-exchange services which are provided by 800 Response and related enhanced services to the inter-exchange services which are provided by such affiliate, 800 Response discloses such customer's CPNI to the affiliate for the purpose of providing such contracted for services to the customer.

Disclosure of CPNI to Customer's Agent at Customer's Request

When specifically requested in writing and signed by an authorized representative of a customer, 800 Response provides such customer's CPNI to an authorized agent of the customer, all as directed by the customer.

Security Breach of CPNI

The requirements under 47 C.F.R. § 64.2011 *Notification of customer proprietary network information security breaches* will be followed should a breach of its customers' CPNI occur. No breach occurred in 2018.

Customer Complaints Regarding CPNI

No customer complaints regarding the unauthorized release of CPNI were received in 2018.